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OECD Guidelines for Financial Transactions &ndash; Important Highlights from the Finalized Guidance Transfer Pricing On February 11, 2020, the OECD issued its final Transfer Pricing Guidance on Financial Transactions, of which Chapters A through E will be incorporated as Chapter X of the OECD Transfer Pricing Guidelines (Chapter X).

Such approaches were relatively novel at the time the 1995 Guidelines were adopted by the OECD Council and so the Committee on Fiscal Affairs stated at paragraph 4.161 of the Transfer Pricing Guidelines that it intended

"to monitor carefully any expanded use of APAs and to promote greater consistency in practice amongst those countries that choose to use them."

On 10 July 2017, the Organisation for Economic Co-operation and Development (OECD) released the latest edition of its Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations ("the Manual" or "OECD TPG"). The Manual was originally published by the OECD Council in 1995 and was subsequently updated in 1996 and 1997.

This report is significant because it is the first time the OECD Transfer Pricing Guidelines includes guidance on the transfer pricing

aspects of financial transactions, which will contribute to consistency in the interpretation of the arm's length principle and help avoid transfer pricing disputes and double taxation.

This 2017 edition of the OECD Transfer Pricing Guidelines incorporates the substantial revisions made in 2016 to reflect the clarifications and revisions agreed in the 2015 BEPS Reports on Actions 8-10 Aligning Transfer pricing Outcomes with Value Creation and on Action 13 Transfer Pricing Documentation and Country-by-Country Reporting.

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The OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations provide guidance on the application of the “arm’s length principle”, which is the international consensus on transfer pricing, i.e. on the valuation, for tax purposes, of cross-border transactions between associated enterprises.

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The EY Worldwide Transfer Pricing Reference Guide 2019-20 is a publication designed to help international tax executives identify transfer pricing

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*OECD publishes details on 40 countries' uptake of transfer ...*

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OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2017 DOI: <https://dx.doi.org/10.1787/tpg-2017-en> This consolidated version of the OECD Transfer Pricing Guidelines includes the revised guidance on safe harbours adopted in 2013, as well as the recent amendments made by the Reports on Actions 8-10 and 13 of the BEPS Actions Plan and conforming changes to Chapter IX.

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